



U.S. Department of Justice

United States Attorney
Southern District of New York86 Chambers Street
New York, New York 10007

October 17, 2016

MEMO ENDORSEDCASE UNDER SEALBY FACSIMILEHon. Kenneth M. Karas
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, NY 10601Re: *United States ex rel. Abrahamsen v. Hudson Valley Hematology-Oncology Associates R.L.L.P., et al.*, 14 Civ. 2653 (KMK) (Under Seal)

Dear Judge Karas:

We write respectfully on behalf of the United States (the "Government") in the above-referenced action, filed under seal by a relator pursuant to the *qui tam* provisions of the False Claims Act, as amended, 31 U.S.C. §§ 3729-3733. By order dated September 15, 2016 (the "September 15 Order"), a copy which is enclosed, the Court directed that, no later than today, October 17, 2016, the case should be unsealed and the Government should file its complaint-in-intervention. We write to respectfully request that the Court provide a copy of the September 15 Order to the Clerk of Court so that it will unseal the matter. Immediately following that unsealing, the Government intends to file its complaint-in-intervention on the docket.

We thank the Court for its consideration of this request.

The clerk of the Court is to note
that this case is to be unsealed
as per the 9/15/16 Order.

Respectfully submitted,

PREET BHARARA
United States Attorney
for the Southern District of New York

By:

/s/

KIRTI VAIDYA REDDY
Assistant United States Attorney
Telephone: (212) 637-2751

Enclosure

cc: by email

Traci Buschner, Esq. (relator's counsel)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA *ex rel.*
LUCILLE ABRAHAMSEN,

Plaintiff,

v.

14 Civ. 2653 (KMK)

HUDSON VALLEY HEMATOLOGY-
ONCOLOGY ASSOCIATES, R.L.L.P.;
RAM R. KANCHERLA; PONCIANO L.
REYES; MICHAEL J. MARESCA; LEV
DAVIDSON; JULIA A. SCHAEFER-
CUTILLO; JEFFREY A. STEWARD;
GERALD A. COLVIN; TAUSEEF AHMED;
JOHN C. NELSON; CARMELLA A.
PUCCIO; KAREN P. SEITER; DELONG
LIU; ASIM AIJAZ; SHEETAL
SHRIMANKER,

UNDER SEAL

~~PROPOSED~~ UNSEALING
ORDER

(KMK)

Defendants.

WHEREAS, on or about April 14, 2014, Relator Lucille Abrahamsen filed a complaint ("Relator's Complaint") in the United States District Court for the Southern District of New York (the "Court") pursuant to the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b) ("FCA");

WHEREAS, in the Relator's Complaint, Relator asserts claims under the FCA (the "FCA claims") on behalf of the United States of America (the "United States") as well as the State of New York, against defendants Hudson Valley Hematology-Oncology Associates, R.L.L.P. ("Hudson Valley"), Ram R. Kancherla, Ponciano L. Reyes, Michael J. Maresca, Lev Davidson, Julia A. Schaefer-Cuttillo, Jeffrey A. Steward, Gerald A. Colvin, Tauseef Ahmed, John C. Nelson, Carmella A. Puccio, Karen P. Seiter, Delong Liu, Asim Aijaz, and Sheetal Shrimanker,

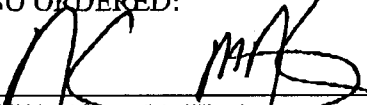
WHEREAS, on September 15, 2016, the United States filed a notice with this Court, indicating that the United States has elected to intervene with respect to the Relators' FCA claims against defendant Hudson Valley (the "Intervention Notice");

IT IS HEREBY ORDERED, that:

1. On or before October 17, 2016, the United States shall file its complaint-in-intervention.
2. On October 17, 2016, the Relator Complaint shall be unsealed.
3. On October 17, 2016, the seal shall be lifted in this matter as to any filing occurring on or after that date, except as otherwise permitted to be filed under seal by the Court.
4. All other documents filed under seal in this action before October 17, 2016, shall remain under seal and not be made public, except for the Intervention Notice and this Order.
5. Within ten business days of the unsealing of this action, *i.e.*, on or before October 27, 2016, the United States shall serve a copy of its complaint-in-intervention on Hudson Valley and any additional defendants, or shall seek waiver of service, in accordance with Federal Rule of Civil Procedure 4.

Dated: New York, New York
September 15, 2016

SO ORDERED:


HONORABLE KENNETH M. KARAS
UNITED STATES DISTRICT JUDGE